

THE SUQUAMISH TRIBE

P.O. Box 498

Suquamish, Washington 98392

May 10, 2000

Mr. Larry J. Tucker
Engineering Field Activity, Northwest
19917 7th Avenue, N.E.
Poulsbo, WA 98370-7570

Re: Draft Site Hazard Assessment, Gorst Creek Landfill

Dear Mr. Tucker:

Thank you for the opportunity to review and provide comments on the Draft Site Hazard Assessment. The Suquamish Tribe offers the following comments:

1. General. The Suquamish Tribe agrees that the landfill needs to be stabilized to prevent debris, contaminants, and sediment from entering Gorst Creek. An important justification for this is the protection of habitat for wild fish in Gorst Creek. Species such as coho and chum salmon and steelhead and cutthroat trout are present in this stream, and these species require 'clean' gravel in order to spawn. High volumes of sediment introduced to the stream has the potential to jeopardize this type of habitat.
2. Page 15, fourth bullet. A pH of 9.0 is unusually high. Unfortunately pH is not a parameter that is regularly measured at the Tribe's rearing facility on Gorst Creek. However, we typically record pH value's between 6.5 - 7.5 in similar streams around Kitsap County. The Tribe recommends some further investigation or confirmatory sampling to determine if this is indeed a real value.
3. Page 16, Screening Level Assessment of Risk to Fish. Wild fish species present in Gorst Creek might also be exposed to chemical contaminants from the landfill. An important issue not considered is the effect of potential landfill slides and the resultant sedimentation and chemical release that might be associated with such an event on wild fish. Sedimentation of downstream spawning gravel is of particular concern.
4. Page 17, first paragraph. It is stated that analytical detection limits were acceptable for all substances except PCBs, 5 SVOCs, and 3 metals. It is further stated that since these compounds were not detected above screening criteria they are therefore not a concern. Isn't the screening level by definition the concentration of concern? If actual concentrations are below the detection limit, but above the screening level, wouldn't this be a concern?
5. Page 18, Sampling and Analysis. It is stated that 'it appears that landfill activities have had a minimal impact on site and area environmental media.' Contaminant detects in the ravine

will indicate that contaminated material at some concentration has been transported to Gorst Creek. Is it possible that a majority or substantial percentage of the contamination that existed historically in the landfill has been leached or otherwise removed from the landfill as a result of the high volumes of water that have moved through the site? Would the Gorst estuary be a likely depositional area for this contamination?

6. Page 19, Recommendations, second paragraph. It is stated that a surface water drainage system is recommended to divert surface water around the landfill. A common problem the Tribe has observed over the years is a gradual loss in the ability of natural systems to moderate surface water flow. This has resulted in increased scouring of streams and erosion due to rapid inputs of surface water. This is often directly related to increases in impervious surfaces and stormwater diversion systems. Is it possible to design a diversion system that avoids rapid inputs of water to the creek? Incorporating a swale or small wetland into the design would address this concern.
7. Page 46, Table 5a. Are the units for organic carbon in this table correct? TOC values reported as a percentage would also be helpful.

Thank you again for this opportunity to provide comments. If you have any questions please call me at (360) 394-5257.

Sincerely,



Scott Pozarycki
Biologist